

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ROBERT M. DUKETT : CHAPTER 13
Debtor :
 :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
 :
vs. :
 :
 :
ROBERT M. DUKETT :
Respondent : CASE NO. 5-22-bk-00714

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 23rd day of May, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. The Trustee avers that debtor's plan is not feasible based upon the following:
 - a. The debtor is unable to make payments under the plan, contrary to § 1325(a)(6).
2. Trustee avers that debtor's plan cannot be administered due to the lack of the following:
 - a. The debtor has not provided to the Trustee copies of 2021 Federal Income Tax returns as required by § 521(e)(2)(A).
 - b. An accurate Means Test (122C Form).
3. The plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2D and 2G of the plan.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 31st day of May, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Poka, Esquire
103 Steven Court
Monroe, NY 10950-4522

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee